

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Chapter 13

ANDREW C. BONEY

Debtor

Case No.: 22-11226

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY NATIONSTAR MORTGAGE, LLC**

Debtor-Respondent, Andrew C. Boney (hereafter "Debtor") responds to the Motion of Nationstar Mortgage, LLC for Relief from the Automatic Stay, as follows:

1. Admitted
2. Admitted.
3. Denied. The averments in paragraph 3 are legal conclusions and can be defined as such. Strict proof is demanded at trial as to all averments contained therein.

4. Admitted.

5. Admitted.

6-12. Denied. The averments in paragraphs 6-12 are legal conclusions and can be denied as such. Strict proof is demanded at trial as to any and all averments contained therein.

By way of further response, Debtor intends to address any issues with respect to post-petition payments by filing an amended Chapter 13 plan.

WHEREFORE, Debtor respectfully requests an Order denying Nationstar Mortgage, LLC's Motion For Relief from the Automatic Stay.

Date: December 12, 2022

BY: /s/ Akeem J. Parsons
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